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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JENNIFER MAREK, ISABELLE DWIGHT,  
DARREN WILLIAMS, JENNIFER GANNON,  
EVVIE EYZAGUIRRE, BRANDI FIKE, LANCE  
WALDRON, JESSICA TEMPEST, and VIVIAN  
NOGUERAS, as individuals, on behalf of  
themselves, the general public and those similarly  
situated,

Plaintiffs,

v.

MOLSON COORS BEVERAGE COMPANY USA  
LLC and MOLSON COORS BEVERAGE  
COMPANY,

Defendants

CASE NO. 21-cv-07174-WHO

**DECLARATION OF WILLIAM  
WRIGHT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FEES,  
COSTS, AND INCENTIVE AWARDS**

I, William C. Wright, declare as follows:

1. I am admitted to the Florida State Bar and am managing attorney at The Wright Law Office, and counsel of record for Plaintiff Evvie Eyzaguirre. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would competently testify thereto under oath.

2. This declaration is submitted in support of Plaintiffs' Motion for Fees, Costs, and Awards, filed concurrently herewith.

3. I am counsel of record for the plaintiff in the following Related Case: *Eyzaguirre v. Molson Coors Beverage Company USA*, No. 22-cv-60889 (S.D. Fla.) (“*Eyzaguirre*”), which was consolidated with this action.

4. My firm assisted with the prosecution of the Related Case listed in paragraph 3 above on a contingent basis with no guarantee of recovery. My firm, along with Sheehan & Associates, P.C. (“Sheehan”) and Gutride Safier LLP (“GSLLP”), incurred 100% of the risk in pursuing those cases.

5. The backgrounds and qualifications from The Wright Law Office attorneys who worked on the matter are set forth in the Firm Resume, which is attached hereto as **Exhibit 1**.

6. My firm, along with Sheehan, was involved in the initial stages of the Related Case listed in paragraph 3 above. My work in these cases included serving as local counsel; research; drafting pleadings; communicating with Sheehan regarding case strategy and the local rules.

7. I am thoroughly familiar with the quality and quantity of work done in this case at The Wright Law Office as I am the only individual who worked on this case from my firm. I have endeavored to ensure there was no unnecessary work or duplication of effort.

8. I believe the work expended by my firm in this litigation was reasonable and necessary considering the amount of work required to litigate the Related Action listed in paragraph 3 above. This work contributed to resolving the Actions.

9. The lodestar calculation is based on the firm’s current billing rates. These rates have been determined to be reasonable by other courts in class action litigations.

10. The professional staff at my firm spent a total of 24 hours on *Eyzaquirre* as of April 14, 2023. The total lodestar for these cases is \$10,800. A breakdown of the lodestar in each case is provided below.

Attorney/ Paralegal	Hours	Rate	Lodestar	Bar Admission Year
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William C. Wright	24	\$450	\$10,800	2012
<b>TOTALS</b>	24	\$450	\$10,800	

11. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately, and such charges are not duplicated in my firm's billing rates. I am not seeking reimbursement of any expenses in the Related Case listed in paragraph 3 above.

I declare under penalty of perjury under the laws of the United States and the State of Florida that the foregoing is true and correct. Executed on April 14, 2023 in West Palm Beach, FL.

/s/ William C. Wright  
 William C. Wright

# EXHIBIT 1

**The Wright Law Office, P.A.**

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The Wright Law Office specializes in the nationwide prosecution of class-action lawsuits to obtain recoveries for its clients and correct corporate wrongdoing. We enforce the rights of consumers, insurance policy holders, homeowners, small businesses and investors in state and federal courts throughout the country.

The Wright Law Office is devoted to helping the consumer and investor. The firm, managed by William C. Wright, is dedicated to consumer, antitrust and securities class-action, as well as the firm's investment-loss practice. Mr. Wright has over 20 years of experience prosecuting class-action cases. Before joining the firm, Mr. Wright practiced at one of the leading plaintiffs' class-action firms in the United States. Prior to his career as a consumer advocate, Mr. Wright served as associate in-house counsel with United Space Alliance, a multibillion-dollar aerospace company charged with handling all space shuttle operations.

The firm has experience in dozens of high-profile class-action lawsuits of national scope, where settlements of hundreds of millions of dollars have been reached. Mr. Wright was involved in numerous nationwide class-action cases brought by dissatisfied policyholders against life insurance companies seeking redress for deceptive sales practices involving insurance products during the 1980's and 1990's. Mr. Wright has also represented African American policyholders in class-action proceedings against life insurance companies seeking redress for racial discrimination in the sale of life insurance policies. Mr. Wright has also been meticulously involved in numerous other consumer class actions in the telecommunications, pharmaceutical, automotive, and food labeling industries for deceptive business practices. More recently, The Wright Law Office was named co-lead counsel in a nationwide consumer class action against one of the leading baby formula manufacturers.

The firm pursues antitrust class actions in a variety of industries to protect consumers and businesses, which rely on America's free-market system, from unfair trade practices. Cases can be brought by businesses or ordinary consumers whom have suffered the anti-competitive impact of antitrust violations. These cases often reveal concealed, unlawful conduct such as price-fixing, monopolization, monopoly leveraging, essential facilities, tying arrangements, vertical restraints and exclusive dealing.

The firm also prosecutes shareholder derivative actions. Mismanagement is rampant among today's publicly traded companies. In a shareholder derivative action, current shareholders can "stand in the shoes" of the company and act against the officers and directors responsible for mismanagement of the company. This is the usual way to bring justice to aggrieved shareholders for the failures of directors or officers that have harmed the company, and to accomplish corporate governance to rectify that mismanagement.

And on an individual basis, the firm also handles cases involving stockbroker or financial advisor misconduct involving investment losses due to unsuitable investing, variable-annuity investment scams, stock churning, excessive trades, margin-trading violations, pyramid schemes and other investment frauds.